

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

In re: NEXIUM (ESOMEPRAZOLE) ANTITRUST LITIGATION	MDL No. 2409 Civil Action No. 1:12-md-02409-WGY
This Document Relates To: All Direct Purchaser Class Actions	

**DIRECT PURCHASER CLASS PLAINTIFFS' MOTION FOR APPROVAL OF
PROPOSED NOTICE PROGRAM AND FORM OF NOTICE, AND SCHEDULING A
HEARING FOR FINAL APPROVAL OF THE SETTLEMENT WITH DR. REDDY'S
LABORATORIES, LTD. AND DR. REDDY'S LABORATORIES, INC. ("DRL")**

Pursuant to Federal Rule of Civil Procedure 23, Direct Purchaser Class Plaintiffs respectfully move for an order: (1) approving the proposed notice plan and form of notice; and (2) setting a schedule for notice to the Direct Purchaser Class and for final approval of the Direct Purchaser Class Settlement with DRL.

The grounds for this motion are set forth in the accompanying Memorandum of Law; the accompanying Declaration of Daniel Coggeshall In Support of Proposed Settlement Notice Program and Proposed Form of Notice, and any other written or oral submission the Court may require. A proposed order is attached hereto.

Dated: October 27, 2014

/s/ **Bruce E. Gerstein**

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CERTIFICATE OF SERVICE

I, Bruce E. Gerstein, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: October 27, 2014

/s/ **Bruce E. Gerstein**
Bruce E. Gerstein